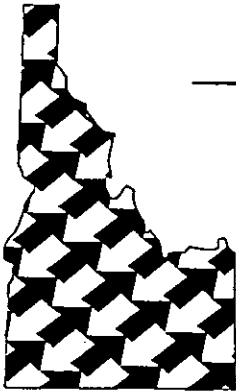


Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory



01-CAB-081

Carol Hanlon
U.S. Department of Energy, Yucca Mountain Site Characterization Office (M/S #025)
P. O. Box 30307
Las Vegas, NV 89036-0307

RECEIVED

Re: Possible Site Recommendation for Yucca Mountain

SEP 24 2001

Dear Ms. Hanlon:

The Site-Specific Advisory Board (SSAB) for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL CAB received the Federal Register Notice (66 FR 43850) announcing the dates and locations of public hearings on the Secretary of Energy's possible recommendation of the Yucca Mountain Site in Nevada for development as a spent nuclear fuel and high-level nuclear waste geologic repository and inviting public comment on that recommendation. We also received an invitation to comment on the possible recommendation from Lake H. Barrett, Acting Director of the Office of Civilian Radioactive Waste Management, with an attachment called "Suggested Topics for Public Comment on Yucca Mountain." We also reviewed the Yucca Mountain Preliminary Site Suitability Evaluation.

Attached is a recommendation, #85, which was reached through consensus at the INEEL CAB's September 2001 meeting. We recognize the challenges DOE faces in making this recommendation, and urge that it be based on technical considerations.

We look forward to your response to our recommendation.

Sincerely,

Stan Hobson
INEEL CAB Chair

cc: Beverly Cook, DOE-ID
Jessie Roberson DOE-HQ
Martha Crosland, DOE-HQ
Fred Butterfield, DOE-HQ
Governor Dirk Kempthorne
Larry Craig, U.S. Senate
Mike Crapo, U.S. Senate
Mike Simpson, U.S. House of Representatives
Butch Otter, U.S. House of Representatives
Robert L. Geddes, President Pro-Tem, Idaho Senate
Laird Noh, Chair, Idaho Senate Resources and Environment Committee
Bruce Newcomb, Speaker, Idaho House of Representatives
JoAn Wood, Chair, Idaho House Resources and Conservation Committee
Jack Barraclough, Chair, Idaho House Environmental Affairs Committee
Gerald Bowman, DOE-ID
Kathleen Trever, State of Idaho INEEL Oversight
Wayne Pierre, U.S. Environmental Protection Agency Region X

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Teri Tyler



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

Yucca Mountain Preliminary Site Suitability Evaluation

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has reviewed the Yucca Mountain Preliminary Site Suitability Evaluation and received the U.S. Department of Energy's invitation to provide public comment (letter dated August 28, 2001 and signed by Lake H. Barrett, Acting Director of the Office of Civilian Radioactive Waste Management).

As a panel of ordinary citizens providing consensus advice to the U.S. Department of Energy, the INEEL CAB is not in a position to assess the adequacy of scientific documentation related to Yucca Mountain nor to assess the suitability of Yucca Mountain as a national geologic repository. The INEEL CAB can only reassert the urgent need for a national repository for safe disposal of the nation's spent nuclear fuel and high level radioactive waste, in keeping with agreements and legally binding settlements that have been put in place based on the assumption that such a facility would be made available to support responsible management of wastes under DOE's stewardship.

The INEEL CAB strongly urges DOE to base its recommendation (whether or not to develop Yucca Mountain as the national geologic repository for spent nuclear fuel and high level radioactive waste) to the President on technical considerations.

The concerns expressed in INEEL CAB's consensus recommendation #66 (dated January 26, 2000, copy attached) are still valid and unresolved. Our primary concerns relate to:

- The waste acceptance criteria that will apply to waste streams that may be disposed in the geologic repository. We urge DOE to develop waste acceptance criteria for the national repository that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.
- The capacity of the geologic repository. We urge DOE to construct the national repository in such a manner that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.
- The schedule for closure of the repository. We urge DOE to establish a schedule for closure of the national repository on a schedule that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.